Presentation for California Regulation and Certification Procedures for Light-Duty Engine Packages for Use In New Light-Duty Specially-Produced Motor Vehicles for 2019 And Subsequent Model Years

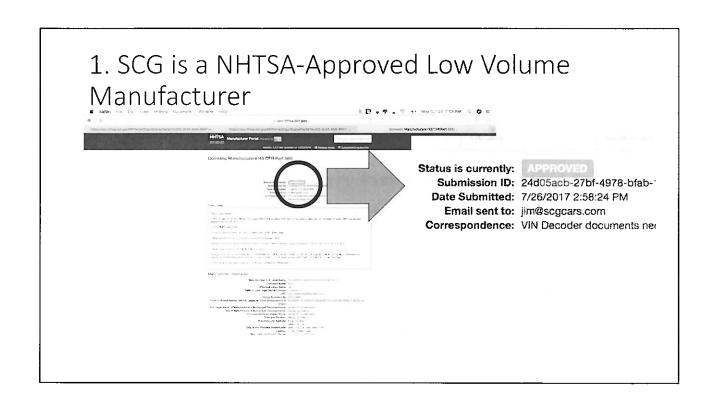
Scuderia Cameron Glickenhaus LLC (SCG)
October 25, 2018

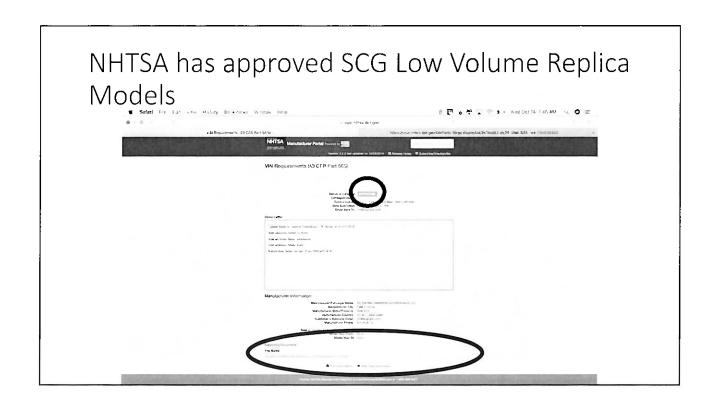
### Roadmap

- 1.Who is SCG?
- 2.CARB's proposed definition prevents regulation from achieving its objectives
- 3. Solutions to allow proposed regulation to achieve its objective

### 1. Who is SCG?









2. Proposed definition prevents regulation from achieving its objectives



CARB's Stated Objective: Align with FAST ACT to Allow Replica Sales in California

"The primary objectives of the proposed regulation are to align with the federal Fixing America's Surface Transportation Act (H.R. 22, 2014), and to create a process for SPMV manufacturers to sell low-emitting replica cars in California."

- CARB Notice of Public Hearing, Page 6

# CARB's proposed replica definition differs significantly from the FAST Act's definition

#### **CARB**

Resembles the body of an on-road motor vehicle, on an overall 1:1 scale (+/- 10 percent), that had been commercially manufactured for sale not less than 25 years ago, with a production run of at least 500 units, before the manufacture of the current model year motor vehicle;

- SPMV § 2209.1(17)-(A)

#### **Federal FAST Act**

- "(i) is intended to resemble the body of another motor vehicle that was manufactured not less than 25 years before the manufacture of the replica motor vehicle;
- FAST Act §. 24405(b)(7)(B)(i)-(ii)

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## Boot Meets FAST Act Definition of Replica

"(i) is intended to resemble the body of another motor vehicle that was manufactured not less than 25 years before the manufacture of the replica motor vehicle; - FAST Act §. 24405(b)(7)(B)(i)-(ii)





Boot is Already Approved by NHTSA under FAST Act

Marked Approved and published by NHTSA in our VIN Decoder

Status is currently: Correspondence:





Submission ID: d0c269a8-cecd-4a64-8ead-d5d00af85b4b

Date Submitted: 10/11/2018 1:25:41 PM

Boot is blocked by CARB's proposed replica definition



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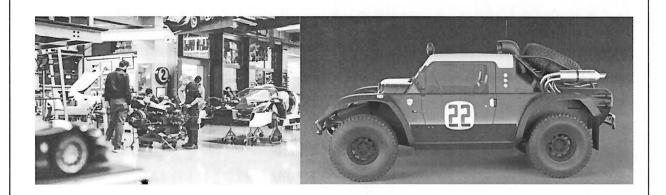
CARB's proposed definition blocks several vehicles that have already been approved by NHTSA under the FAST Act.

Status is currently: Correspondence:

APPROVED

Submission ID: d0c269a8-cecd-4a64-8ead-d5d00af85b4b
Date Submitted: 10/11/2018 1:25.41 PM
Email Sent To: pm@scgcars.com

# 3. Solution to allow proposed regulation to achieve its objective



## Solution A: CARB Replica Definition = FAST Act Replica Definition

CARB

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Solution B: CARB could add the following language to their current definition of replica

"Or any vehicle which has, by the time of the adoption of this regulation, been approved by NHTSA as a replica, as evidenced by the vehicle's identification in a NHTSA-Approved Low Volume Manufacturer's VIN Decoder."

Solution B: CARB could add the following language to their current definition of replica

"Or any vehicle which has, by the time of the adoption of this regulation, been approved by NHTSA as a replica, as evidenced by the vehicle's identification in a NHTSA-Approved Low Volume Manufacturer's VIN Decoder."



If CARB adopts this proposed regulation. . .



•SCG immediately commits to spend at least \$500,000 over the next 12 months in the State of California to design, engineer, fabricate, build, and test a replica Baja Boot.

If CARB adopts this proposed regulation. . .



•SCG will spend an estimated \$10-12 million each year for the next several years in the State of California to manufacture and build replica boots in California If CARB adopts this proposed regulation. . .



•SCG will use Verified Carbon Offsets to more than offset the anticipated lifetime emissions from the vehicle's driving so that each vehicle sold in California will be net carbon negative

If CARB adopts this proposed regulation. . .



•SCG will use our best efforts to license dealers in the State of California to sell, service, and repair the Boots so they stay safe and clean

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- Use our best efforts to license dealers in the State to sell, service, and repair the Boots so they stay safe and clean

### Questions?



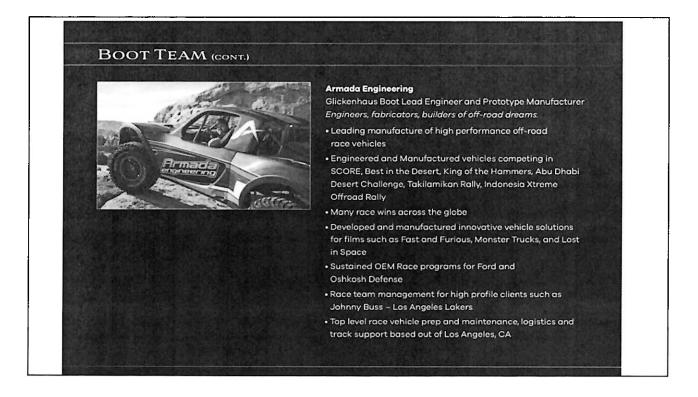
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"Staff is proposing to establish a certification process for new light-duty certified engine packages for use in an SPMV [as manufactured and sold under the Federal FAST Act]."

- CARB Initial Statement of Reasons pages 2-3 "THE PROBLEM THAT THE PROPOSAL IS INTENDED TO ADDRESS."